

EXHIBIT 23

BRITTANY A. SHARPTON Non-Confidential
BARTOLETTI VS. CITIGROUP, et al.

October 04, 2012
5-8

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|--|---|
| <p style="text-align: right;">Page 5</p> <p>1 B. A. SHARPTON</p> <p>2 the record.</p> <p>3 MR. TURNBULL: Ken Turnbull with</p> <p>4 Morgan, Lewis, representing the</p> <p>5 defendants.</p> <p>6 MR. DATOO: Shaffin Datoo and Adam</p> <p>7 Gross for the plaintiffs.</p> <p>8 MS. LOEW: Rachel Loew, Morgan,</p> <p>9 Lewis.</p> <p>10 THE VIDEOGRAPHER: Will the court</p> <p>11 reporter please swear in the witness.</p> <p>12 BRITTANY A. SHARPTON,</p> <p>13 residing at 4901 Southwest 74 Terrace,</p> <p>14 Miami, Florida 33143, having been first</p> <p>15 duly sworn/affirmed by the Notary Public</p> <p>16 (Anneliese R. Tursi), was examined and</p> <p>17 testified as follows:</p> <p>18 EXAMINATION BY MR. TURNBULL:</p> <p>19 Q. Good morning, Ms. Sharpton. As we</p> <p>20 just met a few moments ago, my name is Ken</p> <p>21 Turnbull and I'm representing the defendants</p> <p>22 in the lawsuit that you and others have</p> <p>23 brought in the Southern District of New York.</p> <p>24 The defendants are two Citigroup entities and</p> <p>25 I don't expect that you will know the</p> | <p style="text-align: right;">Page 7</p> <p>1 B. A. SHARPTON</p> <p>2 Q. If at any point during today's</p> <p>3 deposition, you need a break, please let me</p> <p>4 know. So long as there is not a question</p> <p>5 pending, we can take as many breaks as you</p> <p>6 would like. Okay?</p> <p>7 A. Okay.</p> <p>8 Q. If you don't understand something</p> <p>9 that I ask you, please let me know and I will</p> <p>10 rephrase it, to help you understand the</p> <p>11 question. If you answer the question I asked,</p> <p>12 I will assume that you understand it. Is that</p> <p>13 fair?</p> <p>14 A. Okay.</p> <p>15 Q. Are you on any medication that</p> <p>16 would impair your memory or ability to recall</p> <p>17 events?</p> <p>18 A. No.</p> <p>19 Q. Is there any reason that you are</p> <p>20 aware of that would impair your memory?</p> <p>21 A. No.</p> <p>22 Q. Who are your attorneys?</p> <p>23 A. Adam Gross and Shaffin Datoo.</p> <p>24 Q. When did you retain their law firm</p> <p>25 to represent you in this matter?</p> |
| <p style="text-align: right;">Page 6</p> <p>1 B. A. SHARPTON</p> <p>2 corporate structure to know why there are two</p> <p>3 named defendants.</p> <p>4 Throughout the deposition I may</p> <p>5 just use shorthand and use the term Citi. If</p> <p>6 I use that term, will you understand it to</p> <p>7 mean the entity where you worked?</p> <p>8 A. I will.</p> <p>9 Q. During the course of today's</p> <p>10 deposition, I'll be asking you a series of</p> <p>11 questions. My questions and your answers will</p> <p>12 be taken down by the court reporter. In order</p> <p>13 to help her with her job, I'd ask that you let</p> <p>14 me finish a question before you begin your</p> <p>15 answer. And, likewise, I will try to let you</p> <p>16 finish an answer before I start another</p> <p>17 question. Is that fair?</p> <p>18 A. Yes.</p> <p>19 Q. The deposition today is being</p> <p>20 videotaped, as you know. Are you aware that</p> <p>21 this videotape can be played back to a jury?</p> <p>22 A. I am.</p> <p>23 Q. And you are aware that your</p> <p>24 answers today are under oath?</p> <p>25 A. I am.</p> | <p style="text-align: right;">Page 8</p> <p>1 B. A. SHARPTON</p> <p>2 A. I don't remember exactly, exactly</p> <p>3 when I retained their law firm.</p> <p>4 Q. Do you remember the month?</p> <p>5 A. No.</p> <p>6 Q. If I can try and place it in some</p> <p>7 time context for you. You were informed that</p> <p>8 your job was being eliminated in November of</p> <p>9 2008. Do you recall how long after that you</p> <p>10 retained a law firm?</p> <p>11 A. Maybe a few months later. I'm not</p> <p>12 exactly sure exactly when.</p> <p>13 Q. How did it come about that you</p> <p>14 retained the law firm of Thompson Wigdor?</p> <p>15 A. Can you clarify your question?</p> <p>16 Q. Sure. Did you interview law firms</p> <p>17 before choosing one to represent you?</p> <p>18 A. I did not.</p> <p>19 Q. Did somebody tell you that you</p> <p>20 should have this firm represent you?</p> <p>21 A. Did someone tell me? Someone</p> <p>22 suggested a law firm.</p> <p>23 Q. Who suggested a law firm?</p> <p>24 A. Amy Bartoletti.</p> <p>25 Q. Do you know, had Ms. Bartoletti</p> |

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| <p style="text-align: right;">Page 9</p> <p>1 B. A. SHARPTON</p> <p>2 spoken to the law firm when she made that</p> <p>3 suggestion to you?</p> <p>4 A. I'm not sure.</p> <p>5 Q. What did Ms. Bartoletti say when</p> <p>6 she suggested that you retain this law firm?</p> <p>7 A. I can't recall exactly what she</p> <p>8 said.</p> <p>9 Q. Did Ms. Bartoletti suggest that</p> <p>10 you and others join together to sue Citigroup</p> <p>11 collectively as a group?</p> <p>12 A. She may have suggested.</p> <p>13 Q. She may have? Do you recall</p> <p>14 whether she suggested that?</p> <p>15 A. Maybe.</p> <p>16 Q. You may recall, or you do recall</p> <p>17 that she suggested that?</p> <p>18 A. She probably suggested. She was</p> <p>19 the one that probably suggested.</p> <p>20 Q. Who else did she suggest be part</p> <p>21 of that lawsuit?</p> <p>22 A. Can you clarify the question?</p> <p>23 Q. Who else did she suggest to you</p> <p>24 would be part of the group or should be part</p> <p>25 of the group to join together to sue Citi?</p> | <p style="text-align: right;">Page 11</p> <p>1 B. A. SHARPTON</p> <p>2 A. I can't recall exactly when I met</p> <p>3 with Doug.</p> <p>4 Q. How long did you meet with him?</p> <p>5 A. That was so long ago, I don't</p> <p>6 remember.</p> <p>7 Q. At this meeting that you met with</p> <p>8 Mr. Wigdor, was anyone else present?</p> <p>9 A. I believe so.</p> <p>10 Q. Who else?</p> <p>11 A. I believe Amy, Nadine, Lisa and</p> <p>12 Chia.</p> <p>13 Q. And those are the five plaintiffs</p> <p>14 who are suing Citigroup, correct?</p> <p>15 A. The other four, yes, and myself.</p> <p>16 Q. Was there any other person who was</p> <p>17 not part of this lawsuit who met with them on</p> <p>18 that day?</p> <p>19 A. No.</p> <p>20 Q. Did you talk to Nadine Mentor</p> <p>21 about whether you should retain this law firm?</p> <p>22 A. Yes.</p> <p>23 Q. When did you talk to her?</p> <p>24 A. A little while after I was</p> <p>25 terminated.</p> |
| <p style="text-align: right;">Page 10</p> <p>1 B. A. SHARPTON</p> <p>2 A. At the time I received word, I</p> <p>3 wasn't sure besides one other person who would</p> <p>4 be a part of the suit.</p> <p>5 Q. Who was the other person?</p> <p>6 A. Nadine Mentor.</p> <p>7 Q. Did you know Ms. Bartoletti before</p> <p>8 she suggested that you retain this law firm?</p> <p>9 A. Yes.</p> <p>10 Q. In 2008 had you spoken to Ms.</p> <p>11 Bartoletti before you were informed of your</p> <p>12 layoff?</p> <p>13 A. Yes.</p> <p>14 Q. Did Ms. Bartoletti tell you why</p> <p>15 she thought you should join together with</p> <p>16 others to sue Citi?</p> <p>17 A. I don't remember. I don't think</p> <p>18 so.</p> <p>19 Q. Did you meet with the Thompson</p> <p>20 Wigdor firm before deciding whether to retain</p> <p>21 them as your lawyer?</p> <p>22 A. I believe so.</p> <p>23 Q. Who did you meet with?</p> <p>24 A. Doug Wigdor.</p> <p>25 Q. When?</p> | <p style="text-align: right;">Page 12</p> <p>1 B. A. SHARPTON</p> <p>2 Q. What did you and Ms. Mentor</p> <p>3 discuss in that regard?</p> <p>4 A. Can you clarify?</p> <p>5 Q. Sure. What did you and Ms. Mentor</p> <p>6 discuss about whether you should retain this</p> <p>7 law firm?</p> <p>8 MR. DATOO: Objection.</p> <p>9 A. Me and Nadine did not discuss a</p> <p>10 law firm to retain.</p> <p>11 Q. Did you and Ms. Mentor discuss</p> <p>12 suing Citi?</p> <p>13 A. We discussed possibly, yes.</p> <p>14 Q. What did you and she discuss about</p> <p>15 that possibility?</p> <p>16 A. The many factors involved in a</p> <p>17 lawsuit.</p> <p>18 Q. Well, tell me what you remember</p> <p>19 discussing.</p> <p>20 A. Some of the logistics, pros and</p> <p>21 cons.</p> <p>22 Q. And what sort of pros did you</p> <p>23 discuss with Ms. Mentor?</p> <p>24 A. Time, stress, money.</p> <p>25 Q. What cons did you discuss with Ms.</p> |

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| <p style="text-align: right;">Page 190</p> <p>1 B. A. SHARPTON</p> <p>2 speak to an attorney?</p> <p>3 A. About?</p> <p>4 Q. About that -- well, did you speak</p> <p>5 to an attorney after you received that?</p> <p>6 MR. DATOO: At any point in time?</p> <p>7 Because, in theory, that would run</p> <p>8 through today.</p> <p>9 Q. As a result of receiving that, did</p> <p>10 you speak to an attorney?</p> <p>11 A. No. No.</p> <p>12 Q. And just before we broke, we spoke</p> <p>13 a little bit about you getting a job as an</p> <p>14 intern at Citi. Do you recall that?</p> <p>15 A. Yes.</p> <p>16 Q. I'm going to go back to that now</p> <p>17 and pick up from there.</p> <p>18 A. Okay.</p> <p>19 Q. Did you have to interview?</p> <p>20 A. Yes.</p> <p>21 Q. Do you recall who you interviewed</p> <p>22 with?</p> <p>23 A. With about maybe five people.</p> <p>24 Q. And these, I think you said were</p> <p>25 not on-campus interviews. Correct?</p> | <p style="text-align: right;">Page 192</p> <p>1 B. A. SHARPTON</p> <p>2 A. Yes.</p> <p>3 Q. Do you know who that was?</p> <p>4 A. Nadine.</p> <p>5 Q. Nadine Mentor?</p> <p>6 A. Mentor, yes.</p> <p>7 Q. Did you interview with Ms. Mentor?</p> <p>8 A. No.</p> <p>9 Q. Do you know why she called you?</p> <p>10 A. Because I knew her before.</p> <p>11 Q. Did Ms. Mentor put you in touch</p> <p>12 with Citigroup --</p> <p>13 A. Yes.</p> <p>14 Q. -- to interview for that?</p> <p>15 A. Yes.</p> <p>16 Q. Do you know who made the decision</p> <p>17 to offer you employment?</p> <p>18 A. No.</p> <p>19 Q. Tell me about the internship</p> <p>20 program. How did it work?</p> <p>21 A. Interns were placed into different</p> <p>22 product groups and had to support their</p> <p>23 bankers.</p> <p>24 Q. How long was the program?</p> <p>25 A. For about two to three months.</p> |
| <p style="text-align: right;">Page 191</p> <p>1 B. A. SHARPTON</p> <p>2 A. Right.</p> <p>3 Q. So did you interview at</p> <p>4 Citigroup's offices?</p> <p>5 A. Yes.</p> <p>6 Q. Did you interview with Marty</p> <p>7 Feinstein?</p> <p>8 A. Yes.</p> <p>9 Q. Do you recall any of the others</p> <p>10 that you interviewed with?</p> <p>11 A. I think Dia Martin. I believe</p> <p>12 Osee Pierre. And I can't recall the other</p> <p>13 people. Some other senior people, probably.</p> <p>14 Q. Do you recall when you received</p> <p>15 the offer to join the intern program?</p> <p>16 A. Maybe a few months before the</p> <p>17 internship. I don't recall the exact date.</p> <p>18 Q. Some time in early 2006?</p> <p>19 A. Yes.</p> <p>20 Q. Do you know who made you the</p> <p>21 offer?</p> <p>22 A. Whose name was on the offer</p> <p>23 letter? I don't remember.</p> <p>24 Q. Did someone call you and tell you</p> <p>25 you were going to be getting an offer?</p> | <p style="text-align: right;">Page 193</p> <p>1 B. A. SHARPTON</p> <p>2 The summer.</p> <p>3 Q. Did you rotate through different</p> <p>4 departments?</p> <p>5 A. I didn't.</p> <p>6 Q. Do you remember what departments</p> <p>7 you worked for --</p> <p>8 A. Yes.</p> <p>9 Q. -- during your internship?</p> <p>10 A. Yes.</p> <p>11 Q. What departments?</p> <p>12 A. I worked in the housing group.</p> <p>13 Q. Do you remember who was in the</p> <p>14 housing group at that time?</p> <p>15 A. Yes.</p> <p>16 Q. Who was that?</p> <p>17 A. Nick Fleuhr, Amy Bartoletti, Chia</p> <p>18 Siu, Raymond High I believe, and maybe another</p> <p>19 person or two. Maybe more. I forgot.</p> <p>20 Q. When you got an offer to join</p> <p>21 Citigroup as a full-time employee, was it to</p> <p>22 join a particular group?</p> <p>23 A. No.</p> <p>24 Q. Do you know how the people in the</p> <p>25 housing group viewed your work during your</p> |

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| <p style="text-align: right;">Page 194</p> <p>1 B. A. SHARPTON</p> <p>2 internship?</p> <p>3 A. I never heard anything negative.</p> <p>4 Q. Do you know whether anybody in the</p> <p>5 housing group was opposed to you getting an</p> <p>6 offer?</p> <p>7 A. I'm not aware of that.</p> <p>8 Q. Have you heard whether Amy</p> <p>9 Bartoletti was opposed to you getting an offer</p> <p>10 from Citigroup?</p> <p>11 A. I've never heard that.</p> <p>12 Q. Did Ms. Bartoletti ever</p> <p>13 communicate to you any criticisms she had of</p> <p>14 your work while you were an intern?</p> <p>15 A. Nothing negative. Maybe</p> <p>16 suggestions like most directors, but nothing</p> <p>17 stands out.</p> <p>18 Q. During the internship program, was</p> <p>19 there one person or a few people within the</p> <p>20 housing group that you worked mostly with?</p> <p>21 A. Ray.</p> <p>22 Q. Ray High?</p> <p>23 A. Yes.</p> <p>24 Q. Do you remember what his title was</p> <p>25 at that time?</p> | <p style="text-align: right;">Page 196</p> <p>1 B. A. SHARPTON</p> <p>2 Exhibit 12, what I believe to be your offer</p> <p>3 letter from Citigroup.</p> <p>4 (Sharpton Exhibit 12, offer</p> <p>5 letter from Citigroup marked for</p> <p>6 identification, as of this date.)</p> <p>7 Q. Ms. Sharpton, do you recognize</p> <p>8 Exhibit 12?</p> <p>9 A. Yes.</p> <p>10 Q. Is that your offer letter to join</p> <p>11 Citigroup?</p> <p>12 A. Yes.</p> <p>13 MR. DATOO: I'm sorry, Ken, just</p> <p>14 for the record, I would like the</p> <p>15 document itself, I don't know if I'm</p> <p>16 supposed to do this, to be marked</p> <p>17 Confidential, just because it has Mr.</p> <p>18 Sharpton's Social Security number</p> <p>19 unredacted on it.</p> <p>20 THE WITNESS: I also have seen my</p> <p>21 Social Security number.</p> <p>22 MR. TURNBULL: On your</p> <p>23 application?</p> <p>24 THE WITNESS: On my application I</p> <p>25 believe, yes.</p> |
| <p style="text-align: right;">Page 195</p> <p>1 B. A. SHARPTON</p> <p>2 A. Associate I believe or maybe --</p> <p>3 analyst or associate.</p> <p>4 Q. Was there anyone else that you</p> <p>5 worked closely with during your internship?</p> <p>6 A. I worked very briefly with Chia</p> <p>7 when her program rotated her in, but primarily</p> <p>8 with Ray.</p> <p>9 Q. Did you get any feedback from</p> <p>10 anybody during your internship about your</p> <p>11 performance?</p> <p>12 A. Nothing formal. I would get</p> <p>13 suggestions, if I asked, or regular helping</p> <p>14 the intern sort of dialogue.</p> <p>15 Q. After you completed the</p> <p>16 internship, did anyone ever tell you that Ms.</p> <p>17 Bartoletti didn't want you to join the housing</p> <p>18 group?</p> <p>19 A. No.</p> <p>20 Q. When you were offered a position</p> <p>21 as a full-time employee, what position were</p> <p>22 you offered?</p> <p>23 A. An analyst.</p> <p>24 Q. And this will probably help put it</p> <p>25 in time, but let me have marked as Sharpton</p> | <p style="text-align: right;">Page 197</p> <p>1 B. A. SHARPTON</p> <p>2 MR. DATOO: And the same thing for</p> <p>3 Sharpton Exhibit 11 as well.</p> <p>4 MR. TURNBULL: Okay.</p> <p>5 Q. So, Ms. Sharpton, this was the</p> <p>6 offer letter to have you join Citigroup</p> <p>7 following your graduation. Is that right?</p> <p>8 A. Yes.</p> <p>9 Q. What position were you offered?</p> <p>10 A. Financial analyst.</p> <p>11 Q. In which group?</p> <p>12 A. We weren't assigned groups in the</p> <p>13 offer letter.</p> <p>14 Q. You were assigned just as part of</p> <p>15 public finance?</p> <p>16 A. Correct.</p> <p>17 Q. When you joined Citigroup, were</p> <p>18 you assigned to a particular group?</p> <p>19 A. Afterwards, yes. After we joined.</p> <p>20 Q. So tell me when you joined what</p> <p>21 happened. Was there a training program?</p> <p>22 A. There was a training program.</p> <p>23 Q. How long did that last?</p> <p>24 A. Two months, I think.</p> <p>25 Q. After that training program were</p> |

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1 B. A. SHARPTON
2 you assigned to a particular group within
3 public finance?
4 A. Yes.
5 Q. How were those assignments made?
6 A. I expressed my interest wanting to
7 be in the infrastructure group during the
8 summer and I don't know how that feedback
9 reflected into what actually happened.
10 Q. So while you were an intern, you
11 expressed an interest in the infrastructure
12 group?
13 A. Yes.
14 Q. Were you interested in the housing
15 group?
16 A. No.
17 Q. Why not?
18 A. I didn't find it interesting at
19 all.
20 Q. You didn't find the work
21 interesting?
22 A. Not the subject, not the housing,
23 what housing did, no.
24 Q. Is the type of work an analyst
25 does, different depending on the subgroup they

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1 B. A. SHARPTON
2 are in?
3 A. Slightly, but for the most part
4 it's similar.
5 Q. Was the work in the housing group
6 more analytical and more technical than the
7 other groups?
8 A. In the summer I wouldn't have a
9 point of reference to compare.
10 Q. Do you know who decided to make
11 you an offer to join as a full-time employee?
12 A. No.
13 Q. Do you know whether Martin
14 Feinstein was involved in that decision?
15 A. I am not sure.
16 Q. When did you begin working for
17 Citigroup as an analyst?
18 A. In the summer of 2007.
19 Q. July, does that sound right?
20 A. Yes.
21 Q. How did you become interested in
22 the infrastructure group?
23 A. I heard of people working in the
24 infrastructure group before, and I am a big
25 sports fan, enjoy stadiums, roads. I like the

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1 B. A. SHARPTON
2 subject matter.
3 Q. When you started your employment,
4 who did you report to? The full time
5 employment.
6 A. At the time I believe Hadden was
7 still the head of our group, and Tom Green. I
8 think they co-headed in the beginning.
9 Q. So you reported to the head or
10 heads of infrastructure?
11 A. At the very, very beginning, they
12 were the two heads of infrastructure.
13 Q. Do you know whether they approved
14 you joining their group?
15 A. I don't know what the decision
16 process was.
17 Q. When you started as a full-time
18 employee at Citi, did you have any reporting
19 relationship to Mr. Feinstein?
20 A. Besides series exams, not that I
21 can recall.
22 Q. Your starting salary at Citi was
23 \$60,000. Is that right?
24 A. Yes.
25 Q. And then you also received a

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1 B. A. SHARPTON
2 relocation payment?
3 A. Yes.
4 Q. Where were you relocating from?
5 A. From -- I moved from Philly
6 to Miami. Miami was the last place.
7 Q. Do you know whether all the
8 analysts received a relocation package?
9 A. I'm not sure.
10 Q. Did you hold the analyst position
11 throughout your tenure at Citi?
12 A. Yes.
13 Q. Did you get any raises at Citi?
14 A. Yes.
15 Q. When?
16 A. The following summer, after I
17 started.
18 Q. So July of 2008?
19 A. Yes.
20 Q. You got a salary increase?
21 A. Yes.
22 Q. What did it increase to?
23 A. To 70,000.
24 Q. So a \$10,000 salary increase?
25 A. Yes, yes.

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1 B. A. SHARPTON

2 Q. Did you also receive a bonus in

3 the summer of 2008?

4 A. I did.

5 Q. Did you receive that bonus at the

6 same time all analysts received bonuses?

7 MR. DATOO: Objection.

8 A. I know when I received my bonus.

9 Q. Let me see if I can just clarify

10 it a little bit.

11 Was the analyst pay cycle from

12 July to July?

13 A. Yes.

14 Q. And is it your understanding, if

15 you know, were the bonus determinations for

16 analysts made and then paid in the July time

17 period?

18 A. July, August, yeah. That's my

19 understanding.

20 Q. What was your bonus for, that was

21 paid in July of 2008, in or around July of

22 2008?

23 A. I believe about 40-ish thousand.

24 Q. Public finance is part of

25 municipal securities at Citigroup. Is that

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1 B. A. SHARPTON

2 right?

3 A. That's correct.

4 Q. Do you know what other groups are

5 part of the municipal securities?

6 A. Sales and trading. Sales and

7 trading.

8 Q. So public finance is one group,

9 sales and trading is a second group?

10 A. Yes.

11 Q. Were there any other groups who

12 were part of municipal?

13 A. Not that I am aware of.

14 Q. Do you recall when the co-head

15 structure of the infrastructure group changed?

16 A. Not exactly when Jim Hadden left.

17 Q. Was Jim Hadden still at Citigroup

18 at the beginning of 2008?

19 A. I know he switched groups. I'm

20 not -- maybe. Perhaps.

21 Q. And let me ask that same question,

22 but rather than asking if he was still at

23 Citigroup, ask if he was still in the

24 infrastructure group. Was he still in the

25 infrastructure group in the beginning of 2008?

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1 B. A. SHARPTON

2 A. I don't believe so.

3 Q. In this lawsuit you are contending

4 that you were discriminated against. Correct?

5 A. Yes.

6 Q. Who is it that you believe

7 discriminated against you?

8 A. Tom Green and others.

9 Q. Who else?

10 A. The heads of public finance.

11 Q. Mr. Chin and Mr. Brownstein?

12 A. Yes.

13 Q. Anybody else?

14 A. Those were the decision makers, so

15 I hold them accountable.

16 Q. On what basis do you believe you

17 were discriminated against?

18 A. During the layoffs, all of the

19 women, every single one was terminated.

20 The two men that they left, the

21 two analysts, I was more experienced and had

22 more qualifications than Alan Dockery. I have

23 more experience at Citi, and, at the bare

24 minimal, was at least as qualified as Matthew

25 Chin.

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1 B. A. SHARPTON

2 The work that they gave me was the

3 less, quote-unquote sexy of the jobs, mostly

4 pitch books, RFQs, admin-related tasks, while

5 he got all of the modeling work, or at least

6 most of the modeling work, and they also gave

7 most of the modeling work to Alan Dockery who

8 was a year my junior.

9 When I was laid off, Marty

10 Feinstein tapped me on the shoulder, gave me

11 this look of, oh, I'm sorry, and said it's not

12 performance-based. And kind of shrugged his

13 shoulder and waived me off to the HR lady.

14 And Tom Green did not even once

15 reach out to say anything, like he treated the

16 other males that were laid off prior to me.

17 Q. And I think this is clear, but I

18 just want to make sure. You believe you were

19 discriminated against because of your gender?

20 A. That's correct.

21 Q. Any other basis that you believe

22 you were discriminated against?

23 A. I can say for gender.

24 Q. Do you believe you were

25 discriminated against on any other basis?

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2 A. I can't say that for certain.

3 Q. I understand that. I'm not asking

4 you what you can say for certain. I'm just

5 asking you what you believe?

6 A. I believe I was discriminated

7 against because I am a woman.

8 Q. And no other reason?

9 A. No.

10 MR. TURNBULL: Okay. Why don't we

11 change the tape.

12 THE VIDEOGRAPHER: The time is

13 2:36 p.m. and this completes tape 3.

14 (Recess taken.)

15 THE VIDEOGRAPHER: The time is

16 2:41 p.m. and this is tape No. 4 of the

17 videotaped deposition of Ms. Brittany

18 Sharpton.

19 BY MR. TURNBULL:

20 Q. Ms. Sharpton, in this lawsuit you

21 are claiming that your termination was on the

22 basis of your gender. Correct?

23 A. Yes.

24 Q. And that you believe that was

25 discriminatory?

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1 B. A. SHARPTON

2 A. Yes.

3 Q. Is there anything else that

4 occurred during your employment that you

5 believe was discriminatory?

6 A. Perhaps.

7 Q. As you sit here today, is there

8 anything that you can recall that you believe

9 was discriminatory?

10 A. Not as I sit here today.

11 Q. And other than your termination,

12 you are not challenging any other acts in the

13 workplace as being discriminatory. Is that

14 correct?

15 A. Conversations amongst men in my

16 presence about other women were a little

17 uncomfortable. Things like that.

18 Q. What do you mean when you say

19 conversations amongst men. What are you

20 referring to?

21 A. Matthew Chin and Jason Baran would

22 frequently talk about how hot women's butts

23 were as they walked to the bathroom. We sat

24 right in front of the rest rooms. And Matthew

25 would lean over to me and say, oh, look how

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1 B. A. SHARPTON

2 great such-and-such looks today. This

3 happened frequently.

4 Q. Did you ever make similar comments

5 about men in the workplace?

6 A. How sexy their butts looked as

7 they walked to the bathroom, no.

8 Q. Did you ever comment on how a man

9 looked in their appearance --

10 A. Sure.

11 Q. -- in the workplace?

12 A. Sure.

13 Q. And have you ever commented on

14 whether they were attractive or not

15 attractive?

16 A. Yes.

17 Q. Other than those comments that you

18 referred to that Mr. Chin made, is there

19 anything else that you believe was

20 discriminatory that occurred in the workplace?

21 A. An instance with Mathilde McLean,

22 sexual harassment between her and Wally

23 Kulakowski.

24 Q. Tell me about that.

25 A. Well, Mathilde confided in me

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1 B. A. SHARPTON

2 sometimes and she told me that she was being

3 sexually harassed. I was wondering what

4 happened with Wally when they fired him.

5 Q. And what did Ms. McLean tell you

6 in that regard?

7 A. She didn't really go into detail.

8 She got very emotional, but she did tell me

9 that she was sexually harassed.

10 Q. You didn't observe any of that

11 harassment, did you?

12 A. Thank goodness, no.

13 Q. Is there anything that happened to

14 you or that you observed in the workplace

15 other than the termination that you believe

16 was discriminatory?

17 A. Giving me the less desirable work

18 only after I've clawed and literally begged to

19 be put on more quant-heavy and technical

20 assignments and not the stereotypical womanly

21 admin-related tasks that are necessary, but I

22 wanted to work on Wall Street for more than

23 responding to RFQs and pitch books and such.

24 Q. Do you know why you were assigned

25 that work that you believe was less desirable?

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1 B. A. SHARPTON

2 in a row this happened." Correct?

3 A. Yes.

4 Q. What are you referring to?

5 A. Probably being screamed at by

6 Kimberly Swain. I don't know for sure.

7 Q. Was Ms. Swain unhappy with the

8 work product you were giving her?

9 A. She never gave me a negative

10 feedback.

11 Q. Well, you just said you think it

12 is probably because she screamed at you?

13 A. People scream for various reasons.

14 That was her -- she was known to be a very,

15 just neurotic, screaming type of manager.

16 Q. Do you recall Ms. Swain ever

17 communicating to you any issues she had with

18 your work performance?

19 A. If there was something she needed

20 or some suggestion she would make, or if I

21 asked, you know, for a suggestion, a

22 recommendation, she would give it to me.

23 Q. Do you recall Ms. Swain ever

24 telling you, in words or substance, that she

25 was unhappy with your work performance?

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1 B. A. SHARPTON

2 A. No.

3 Q. Do you recall her ever telling you

4 that she was not happy with something you had

5 done for her?

6 A. Not in those words, but by her

7 screaming.

8 Q. Maybe not using the words, I'm not

9 happy, but the substance, you certainly

10 understood she was not happy. Do you recall

11 any situations like that?

12 A. When she started yelling, she was

13 screaming at me, crazily.

14 Q. How many occasions do you recall

15 where she was unhappy with the work that you

16 had given her?

17 A. I can't say that she was screaming

18 as a result my work product, but she screamed

19 at me many times.

20 Maybe she had issues at home. I

21 don't know what was up with Kimberly.

22 Q. Do you recall her ever being

23 unhappy, whether or not she used that word,

24 with your performance at Citigroup?

25 A. I don't.

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1 B. A. SHARPTON

2 Q. Do you know whether Ms. Swain ever

3 communicated to any of her superiors, her

4 views on your performance?

5 A. I'm not sure.

6 Q. Did Ms. McLean ever express any

7 unhappiness with your work performance?

8 A. Not to me.

9 Q. When you say in your e-mail here

10 "two times in a row this happened," what is it

11 that happened two times in a row?

12 A. I can't recall exactly what I'm

13 referring to.

14 Q. Do you recall whether it referred

15 to something you were working on with Ms.

16 Swain?

17 A. I'm just assuming since she

18 screamed at me, or screamed in general, the

19 most, but I'm not sure.

20 Q. Do you know whether Ms. Swain had

21 a view of your performance based on your

22 gender?

23 A. I do appreciate the fact that

24 Kimberly was the only senior banker who would

25 give me technical and modeling work and she

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1 B. A. SHARPTON

2 gave me and Margaret -- she tried to include

3 us where the men excluded us in that aspect of

4 the job. So in that regards, yes.

5 Q. So do you think she favored you

6 because of your gender?

7 A. That's not what I said. I said

8 that she was the, really the only banker until

9 I begged to get work in the other subgroups

10 that would make it a point to try to include

11 the women in our group in technical

12 assignments.

13 Q. Didn't Tom Green try to help you

14 with your modeling skills?

15 A. I don't recall.

16 Q. Is it possible that he did and you

17 just don't remember?

18 A. It's a possibility.

19 Q. And didn't you have people tell

20 you that your modeling skills were weak?

21 A. It's a possibility.

22 Q. Didn't you work with Stephen Wood?

23 A. I worked with Steve.

24 Q. And you really liked Steve Wood,

25 right?

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|---|--|
| <p style="text-align: right;">Page 238</p> <p>1 B. A. SHARPTON</p> <p>2 A. I do.</p> <p>3 Q. You thought he gave you</p> <p>4 opportunities, correct?</p> <p>5 A. What sort of opportunities?</p> <p>6 Q. Work opportunities, such as</p> <p>7 modeling.</p> <p>8 A. In that group the modeling wasn't</p> <p>9 as heavy as, say, transportation, but it was</p> <p>10 an opening to hopefully get some of the work</p> <p>11 that I was seeking.</p> <p>12 Q. And so Mr. Wood did give you</p> <p>13 opportunities to develop your skills, didn't</p> <p>14 he?</p> <p>15 A. He gave me a crack. That does not</p> <p>16 mean I got those assignments.</p> <p>17 Q. Wasn't Mr. Wood your favorite</p> <p>18 banker at Citigroup?</p> <p>19 A. He was one of them.</p> <p>20 Q. Who else were your favorites?</p> <p>21 A. Nadine.</p> <p>22 Q. Did you work with Ms. Mentor?</p> <p>23 A. I did.</p> <p>24 Q. Who else?</p> <p>25 A. I worked with many different</p> | <p style="text-align: right;">Page 240</p> <p>1 B. A. SHARPTON</p> <p>2 other analysts in the infrastructure group?</p> <p>3 A. She did.</p> <p>4 Q. Do you know how she viewed their</p> <p>5 skills as compared to yours?</p> <p>6 A. No idea.</p> <p>7 Q. Did you ever work directly with</p> <p>8 Tom Green on any assignments?</p> <p>9 A. Directly? Not directly.</p> <p>10 Q. Do you know whether Mr. Green</p> <p>11 worked with any of the analysts in the group?</p> <p>12 A. Perhaps.</p> <p>13 Q. You don't know one way or the</p> <p>14 other?</p> <p>15 A. I'm not sure what he was doing all</p> <p>16 the time.</p> <p>17 Q. Did Ms. McLean work with other</p> <p>18 analysts in the group?</p> <p>19 A. She did until she was forbidden,</p> <p>20 or Matt was forbidden from working with her</p> <p>21 because of outbursts and unprofessional</p> <p>22 behavior.</p> <p>23 Q. Do you know what her views were on</p> <p>24 the skills of the other analysts in the group?</p> <p>25 A. I do not.</p> |
| <p style="text-align: right;">Page 239</p> <p>1 B. A. SHARPTON</p> <p>2 bankers.</p> <p>3 Q. Who else were your favorites?</p> <p>4 A. At this point in time at the top</p> <p>5 of my head, I enjoyed working with Steve and</p> <p>6 Nadine.</p> <p>7 Q. Did Ms. McLean ever offer</p> <p>8 suggestions to you about your modeling skills?</p> <p>9 A. Mathilde, she was open to helping.</p> <p>10 She was a helpful woman.</p> <p>11 Q. And did Ms. McLean tell you you</p> <p>12 had some weaknesses that you needed would work</p> <p>13 on with your modeling skills?</p> <p>14 A. I don't recall, but I did ask</p> <p>15 Mathilde as an AVP for help which is usual</p> <p>16 with a junior person.</p> <p>17 Q. But you don't recall whether she</p> <p>18 told you that you needed to work on your</p> <p>19 modeling skills because they were weak?</p> <p>20 A. I don't recall her saying those</p> <p>21 words.</p> <p>22 Q. How about the substance? Put</p> <p>23 aside the words.</p> <p>24 A. I can't recall.</p> <p>25 Q. Did Ms. Swain work with any of the</p> | <p style="text-align: right;">Page 241</p> <p>1 B. A. SHARPTON</p> <p>2 Q. Do you know whether Ms. McLean</p> <p>3 communicated her views on the skills of the</p> <p>4 analysts, to any of her supervisors?</p> <p>5 A. I don't know.</p> <p>6 Q. Do you know whether Ms. Swain</p> <p>7 communicated her views on the skills of the</p> <p>8 analysts, to any of her supervisors?</p> <p>9 A. I don't know.</p> <p>10 Q. Do you know how many individuals</p> <p>11 in the public finance group were laid off in</p> <p>12 the January reduction in force?</p> <p>13 A. I'm not for certain, no.</p> <p>14 Q. Do you recall that there was a</p> <p>15 reduction in force in March of 2008?</p> <p>16 A. I don't remember the dates.</p> <p>17 Q. Let me bring it down from the</p> <p>18 public finance level to your group level.</p> <p>19 A. Okay.</p> <p>20 Q. Do you know how many people were</p> <p>21 let go in the first round reduction in force</p> <p>22 in the January time period that we were</p> <p>23 looking at earlier?</p> <p>24 A. I can guess, but I'm not sure.</p> <p>25 Q. What's your recollection how many</p> |

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|--|---|
| <p style="text-align: right;">Page 242</p> <p>1 B. A. SHARPTON</p> <p>2 people were let go in that round?</p> <p>3 A. As a guess -- I mean, I'm not</p> <p>4 sure. I don't know.</p> <p>5 Q. Do you recall Brian Cloonan being</p> <p>6 let go in that group, in that RIF?</p> <p>7 A. I know he was let go. In which</p> <p>8 part of the year, I'm not sure.</p> <p>9 Q. And that was a person that we</p> <p>10 talked about earlier who was an analyst at the</p> <p>11 time, correct?</p> <p>12 A. We did mention that Brian Cloonan</p> <p>13 is an analyst, yes.</p> <p>14 Q. What analyst class was he in 2008?</p> <p>15 A. I know he was older than I was.</p> <p>16 Q. Do you recall whether he was one</p> <p>17 year senior or more than one year senior?</p> <p>18 A. Maybe one. I don't -- I think --</p> <p>19 I don't know. I can't -- I don't know.</p> <p>20 Q. Do you know whether Walter</p> <p>21 Kulakowski was let go in the January RIF?</p> <p>22 A. He was fired for sexual</p> <p>23 harassment.</p> <p>24 Q. Was he let go in the January RIF?</p> <p>25 A. I don't know. I just -- I don't</p> | <p style="text-align: right;">Page 244</p> <p>1 B. A. SHARPTON</p> <p>2 Q. Do you recall any women being let</p> <p>3 go from your group at any point before the</p> <p>4 November RIF?</p> <p>5 A. No.</p> <p>6 Q. How many people were let go in the</p> <p>7 November RIF from your group?</p> <p>8 A. From my group? I believe four.</p> <p>9 Q. Who do you believe?</p> <p>10 A. All three of the women.</p> <p>11 Q. Can you give me the names of the</p> <p>12 people you recall.</p> <p>13 A. Brittany Sharpton, Mathilde</p> <p>14 McLean, Kimberly Swain and Stephen Wood.</p> <p>15 Q. Was there someone in your group</p> <p>16 named Tom Bradshaw?</p> <p>17 A. There is -- was, yes.</p> <p>18 Q. Was he let go in that November</p> <p>19 RIF?</p> <p>20 A. I don't think -- I mean, I don't</p> <p>21 know. I don't recall.</p> <p>22 Q. Is it possible he was let go in</p> <p>23 that November RIF?</p> <p>24 A. It's a possibility. I don't</p> <p>25 remember.</p> |
| <p style="text-align: right;">Page 243</p> <p>1 B. A. SHARPTON</p> <p>2 know.</p> <p>3 Q. How about Thomas Boast, was he</p> <p>4 also let go in the January RIF?</p> <p>5 A. I don't remember when Tom, I don't</p> <p>6 remember the time frames.</p> <p>7 Q. Tom Boast was a director?</p> <p>8 A. He was.</p> <p>9 Q. And Mr. Kulakowski was a director?</p> <p>10 A. Yes.</p> <p>11 Q. Do you recall any women being let</p> <p>12 go from your group in the January reduction in</p> <p>13 force?</p> <p>14 A. Well, all the women were let go in</p> <p>15 my round, so there were no other women in the</p> <p>16 group, so, no.</p> <p>17 Q. No, no, I'm not sure my question</p> <p>18 was clear.</p> <p>19 The January RIF preceded your</p> <p>20 reduction, correct?</p> <p>21 A. Right.</p> <p>22 Q. So in the January RIF do you</p> <p>23 recall whether any women were let go from your</p> <p>24 group?</p> <p>25 A. I do not recall.</p> | <p style="text-align: right;">Page 245</p> <p>1 B. A. SHARPTON</p> <p>2 Q. Do you know why Ms. Swain was</p> <p>3 selected for termination in November?</p> <p>4 A. I only know about myself. I don't</p> <p>5 know her situation.</p> <p>6 Q. Do you know why Mr. Wood was let</p> <p>7 go in November?</p> <p>8 A. I don't know.</p> <p>9 Q. Do you know why Ms. McClean was</p> <p>10 selected for termination?</p> <p>11 A. I don't know.</p> <p>12 Q. Do you know why you were selected</p> <p>13 for termination?</p> <p>14 A. Based on what happened to me,</p> <p>15 because I'm a woman.</p> <p>16 Q. Why do you believe you were let go</p> <p>17 because you are a woman?</p> <p>18 MR. DATOO: Objection: asked and</p> <p>19 answered.</p> <p>20 A. Each and every woman in my group</p> <p>21 was terminated. The analysts that they kept,</p> <p>22 Alan Dockery, I was more experienced than he</p> <p>23 was, more qualified than he was, I had more</p> <p>24 experience at Citi than Matt Chin and at best,</p> <p>25 at the minimum, as qualified as Matt. I was</p> |

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1 B. A. SHARPTON

2 A. I didn't compare myself. I just

3 know about me.

4 Q. You also mentioned that the

5 analysts had to interface with clients. Is

6 that right?

7 A. Sometimes.

8 Q. Did you interface with clients?

9 A. Via telephone.

10 Q. Did the other analysts in your

11 group interface with clients?

12 A. I don't know.

13 Q. Did the other analysts in your

14 group do financial analysis?

15 A. Yes.

16 Q. Did Matthew Chin do financial

17 analysis?

18 A. They would primarily give Matthew

19 and Alan Dockery the financial modeling work.

20 Q. When you say they would give the

21 work, who is they?

22 A. The decisionmakers in our group,

23 Tom Green would -- is the decisionmaker in our

24 group.

25 Q. Tom Green would decide who would

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1 B. A. SHARPTON

2 do what work on a particular deal or a pitch

3 or a transaction?

4 A. Well, I know I went to Tom Green

5 when I wanted to be put on these deals, so I'm

6 under the assumption that he has the authority

7 to make those decisions.

8 Q. Before you went to Tom Green, did

9 anybody ask you to do financial analysis?

10 A. Kimberly Swain was the only other

11 that gave me real financial modeling work.

12 Q. Do you know why Matthew Chin got

13 more financial modeling work than you?

14 A. I don't know what the decision

15 process entailed.

16 Q. Do you know whether the persons

17 making those decisions thought Matthew Chin

18 had better financial modeling skills than you

19 did?

20 A. No.

21 Q. Do you know why Alan Dockery was

22 given financial analysis work more than you?

23 A. No.

24 Q. Do you know whether the decision

25 makers thought that Alan Dockery's financial

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1 B. A. SHARPTON

2 analysis and modeling skills were stronger

3 than yours?

4 A. I don't know.

5 Q. In your complaint in the section

6 that deals with your performance -- this is

7 Exhibit 8 if you want to look at it.

8 A. Yes.

9 Q. I'm going to read you a paragraph,

10 or part of it.

11 A. Okay.

12 Q. I'm going to look at paragraph

13 110. Paragraph 110 states: "Throughout her

14 career with Citigroup, Ms. Sharpton performed

15 her job with the highest degree of

16 professionalism and competence."

17 Do you see that?

18 A. Yes.

19 Q. Do you believe that to be true?

20 A. Yes.

21 Q. Was there any time during your

22 employment at Citigroup where you did not

23 perform with the highest degree of

24 professionalism?

25 A. I strive to always perform at the

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1 B. A. SHARPTON

2 highest degree of professionalism and

3 competence.

4 Q. I understand that you strive to do

5 that. Do you believe that there were any

6 times where you did not perform with the

7 highest degree of professionalism?

8 A. If I was -- the train was late --

9 I mean, I strived to perform at the highest

10 degree of professionalism and competence.

11 Q. Do you think referring to people

12 as, the people you worked with with nicknames

13 such as Chronic, is the highest degree of

14 professionalism?

15 A. I did not say this to their face,

16 but it could be interpreted either way.

17 Q. What do you mean it could be

18 interpreted either way?

19 A. That didn't interfere in the least

20 with my performance and my work product.

21 Q. Do you think it could be viewed as

22 less than the highest degree of

23 professionalism?

24 A. I can't see what people can view

25 things as.

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1 B. A. SHARPTON

2 Q. What about referring to people as,

3 white people as saltines, do you think that is

4 the highest degree of professionalism?

5 A. It doesn't interfere with my work

6 product.

7 Q. But do you think that is

8 performing your job with the highest degree of

9 professionalism?

10 A. It doesn't interfere with me

11 performing my job.

12 Q. I understand.

13 A. The highest degree of

14 professionalism, it doesn't interfere.

15 Q. So you think that calling someone

16 a saltine or a cracker reflects the highest

17 degree of professionalism?

18 MR. DATOO: Objection.

19 A. I never called somebody a cracker

20 or a saltine.

21 Q. But you referred to them as that

22 in your e-mails, right?

23 MR. DATOO: Objection.

24 A. In the e-mail, that's what was

25 written down.

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1 B. A. SHARPTON

2 Q. In more than one e-mail you reused

3 that term to refer to white people, right?

4 MR. DATOO: Objection.

5 A. Probably, perhaps.

6 Q. And do you think, and you did that

7 on the Citigroup system, right?

8 A. Yes.

9 Q. And, in fact, you referred to some

10 of the people at Citigroup with those terms,

11 correct?

12 MR. DATOO: Objection.

13 A. Yes.

14 Q. Do you think that reflects the

15 highest degree of professionalism?

16 A. It could be interpreted. It

17 depends who is interpreting.

18 Q. Earlier -- we will look at some of

19 those in a little while.

20 Do you think that throughout your

21 employment at Citigroup you performed with the

22 highest degree of competence?

23 A. Yes.

24 Q. At all times?

25 A. No one is perfect at all times,

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1 B. A. SHARPTON

2 but I did perform at the highest degree of

3 competence.

4 Q. What do you define as the highest

5 degree of competence?

6 A. The highest degree that Brittany

7 Sharpton is competent.

8 Q. You referenced earlier your 2008

9 performance review. Do you remember what your

10 ratings were on that?

11 A. 2, 3.

12 Q. Do those ratings reflect the

13 highest degree of competence?

14 A. It depends on what your basis is.

15 Q. Well, do you know what the rating

16 system was on those reviews, what the scale

17 was?

18 A. The scale, I believe 1 through 5.

19 Q. With one being the highest?

20 A. Yes.

21 Q. And you recall getting 2s and 3s?

22 A. Yes.

23 Q. Would you agree that a 1 rating

24 would reflect a higher degree of competence

25 than a 2 or a 3?

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1 B. A. SHARPTON

2 A. I don't equate those numbers to

3 competence.

4 Q. Let's look at your review for

5 2008. We will have this marked as Sharpton

6 Exhibit 18.

7 (Sharpton Exhibit 18, Brittany

8 Sharpton's 2008 financial analyst

9 year-end performance review marked

10 for identification, as of this

11 date.)

12 Q. Ms. Sharpton, do you recognize

13 Exhibit 18?

14 A. Yes.

15 Q. What is this?

16 A. This is my 2008 financial analyst

17 year-end performance review.

18 Q. Do you know who completed this

19 review?

20 A. I don't know who completed this

21 form.

22 Q. Were you given this form while you

23 were employed at Citigroup?

24 A. Yes.

25 Q. Who gave it to you?

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2 A. This was discussed with Tom Green.

3 Q. Do you know if Tom Green is the

4 one who gave you the ratings on this form?

5 A. No, I don't know.

6 Q. Do you know whether -- well, do

7 you know who had input into the ratings that

8 are reflected on this form?

9 A. I don't know.

10 Q. And I'm looking at the first page

11 of the document which has a number of

12 categories, and there is one category where

13 you got rated a 1. Do you see that?

14 A. Yes.

15 Q. Do you think that 1 rating would

16 reflect the highest degree of competence in

17 that area?

18 A. I don't equate any of these

19 ratings to competence.

20 Q. In the quantitative skills

21 section, do you see the first category you are

22 ranked a 3?

23 A. Yes.

24 Q. And that is, "possesses strong

25 quantitative skills and expert knowledge of

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1 B. A. SHARPTON

2 products and institutional features of

3 relevant markets."

4 A. Yes.

5 Q. Did Mr. Green tell you during your

6 review that your quantitative skills were

7 rated a 3?

8 A. He probably in conversation went

9 over that line item.

10 Q. Did he tell you he thought you

11 needed to improve in that area?

12 A. I can't recall our conversation.

13 Q. And the next one down you also got

14 rated a 3. Do you see that?

15 A. Yes.

16 Q. Did you talk about that with Mr.

17 Green?

18 A. We may have.

19 Q. Do you remember him telling you

20 you need to improve in this area?

21 A. I don't remember our conversation.

22 Q. And I'm not going to go through

23 every one of these, but down on the bottom,

24 the overall quantitative skills rating is 3.

25 When you saw that rating, did you think you

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2 needed to improve your quantitative skills?

3 A. I'm always striving to improve.

4 Q. So when you saw that rating, did

5 you think you needed to improve your

6 quantitative skills?

7 A. That further prompted me to insist

8 on being on more quant-heavy jobs. My skills

9 were fine. My experience on jobs that

10 required those skills is a completely

11 different issue.

12 Q. Do you know whether people were

13 reluctant to give you quantitative assignments

14 because they didn't have confidence in your

15 ability?

16 A. I don't know.

17 Q. And do you see in the next

18 category your overall rating in the quality of

19 work produced is a 3?

20 A. Yes.

21 Q. Did you talk about that with Mr.

22 Green?

23 A. I don't remember our conversation.

24 Q. Do you remember getting any

25 criticisms about the quality of the work that

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1 B. A. SHARPTON

2 you were turning in?

3 A. In which regard?

4 Q. In any regard.

5 A. Suggestions may have been made, or

6 recommendations.

7 Q. Constructive suggestions as to how

8 to improve?

9 A. Suggestions.

10 Q. As to how to improve?

11 A. When I asked, yes.

12 Q. When you saw this rating of 3 in

13 this overall quality of work produced rating,

14 did you think you needed to improve?

15 A. I thought the ratings should be

16 higher, but I'm always striving to improve.

17 Q. Did you tell Mr. Green you thought

18 the rating should be higher?

19 A. I don't remember our conversation.

20 Q. Do you remember ever being told

21 you need to improve your attention to detail?

22 A. I do recall.

23 Q. And do you recall that that was a

24 big part of this review?

25 MR. DATOO: Objection.

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2 A. I don't recall that being a big

3 part of this review.

4 Q. Do you recall it being any part of

5 the review?

6 A. I don't recall the conversation.

7 Q. How about as you read the review

8 itself?

9 A. I remember the review. The

10 conversation I cannot recall.

11 Q. Well, the review itself notes that

12 you should continue to improve your attention

13 to detail. When you read this in the review,

14 did that come as a surprise to you?

15 A. No, improvement is standard for

16 any junior employee, anyone in general,

17 actually.

18 Q. Did any of the senior bankers that

19 you worked with, tell you you needed to

20 improve your attention to detail?

21 A. Not -- I can't -- I don't

22 remember.

23 Q. Do you remember giving work

24 product in to people that you worked with that

25 contained just cut and pastes from earlier

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2 presentations?

3 A. Sure.

4 Q. And do you recall that in those

5 instances there were times where you didn't

6 even change the details to reflect that it was

7 a different deal and you couldn't just cut and

8 paste from an earlier deal?

9 A. I've made mistakes.

10 Q. And do you recall being told you

11 need to improve upon those, that we rely upon

12 you as an analyst, to improve on those?

13 A. I don't recall someone saying

14 that.

15 Q. What was your overall rating?

16 A. 3 trending 2.

17 Q. And 3 stands for meets

18 expectations?

19 A. Correct.

20 Q. Did Mr. Green help you find more

21 complex assignments?

22 A. After I asked to be put on more

23 complex assignments, I'm assuming he had -- I

24 don't know what he did afterwards, but I was

25 eventually staffed to more quant-heavy

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1 B. A. SHARPTON

2 assignments.

3 Q. Was that after you got this

4 midyear review?

5 A. I don't remember --

6 Q. I'm sorry, this July review. June

7 review.

8 A. -- when exactly I asked.

9 Q. After you were put on those, what

10 you described as more quant-heavy assignments,

11 do you recall that you had problems actually

12 doing that quant-heavy work?

13 A. Problems? Problems. It is more

14 challenging than a pitch book, so it's a

15 challenge.

16 Q. Did you ever refer to Kim Swain as

17 MB?

18 A. No.

19 Q. Do you know what those initials

20 are, MB; do you know what they stand for?

21 A. I'm not exactly sure.

22 Q. Do you recall referring to anybody

23 in your group as something with those

24 initials?

25 A. It could be Margaret Barry.

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1 B. A. SHARPTON

2 Q. Did you have problems with

3 Margaret Barry?

4 A. Not problems. Personality

5 differences.

6 Q. Did Margaret Barry ever express to

7 you frustration with your work product?

8 A. Margaret was my equal. She took

9 on the characteristics of Kimberly and tried

10 to impose herself as someone with more

11 authority than she did have.

12 MR. TURNBULL: Let me mark this

13 e-mail, the top e-mail is dated December

14 3, 2007 and it is a string of e-mails.

15 We will have it marked as Sharpton

16 Exhibit 19.

17 (Sharpton Exhibit 19, e-mail

18 string, top e-mail dated December

19 3, 2007 marked for identification,

20 as of this date.)

21 Q. Do you recognize this document,

22 Ms. Sharpton?

23 A. Yes.

24 Q. The top e-mail is an e-mail to

25 your friend Sherrise Pond, right?